



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 18 2009

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Williams
Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

Subject: Financial Assurance Demonstration Textron Inc. /Grenada Manufacturing LLC
EPA ID No. MSD007037278

Dear Mr. Williams:

Thank you for the Financial Assurance Demonstration dated March 20, 2009, from Textron Inc. on behalf of the former Randall Textron facility located at 635 Highway 332, Grenada, Mississippi 38901. I am writing to inform you that the Financial Assurance Requirements under the Hazardous and Solid Waste (HSWA) permit require a greater degree of detail than provided in your submission.

EPA conducted a review of the letter of credit (LOC) issued by JPMorgan Chase Bank, N.A. on April 30, 2009, in the amount of \$4,784,221.00 for the account of Textron Inc. for that corporation's corrective action (CA) financial assurance (FA) obligations at the Grenada Manufacturing facility (based upon the EPA ID number referenced in the LOC). This LOC was received by EPA March 26, 2009.

In an E-mail dated May 15, 2009, Textron furnished a breakdown of major future remediation and maintenance costs of \$4,784,221, which matches the newly-furnished LOC dated April 30, 2009. However, there is no detailed breakdown of the various costs. EPA needs the following financial assurance cost breakdowns:

- For the indoor air monitoring events in 2009 and 2014, the PRB Rejuvenation event and the 20-year site-wide monitoring, the facility cost estimate (CE) should be delineated in terms of labor hours, travel time for techs, number of samples, work rate for sampling, and analytical methodologies. The unit pricing for all of these line items should be documented.
- The sludge lagoon post-closure care CE should have more information in terms of labor hours, travel time for techs, number of samples (if any), work rates for all

PC-care activities, analytical methodologies (if any), and any other PC-care activities. The unit pricing for all of these line items should be documented.

- For the wet well sump inspection, some additional CE information should be provided.
- For the chrome and TCE remediation under the main plant building, what is the remedial alternative anticipated? The facility CE should be more detailed in order to reflect the planned remediation methodology.

To date, missing documentation for this replacement FA instrument includes:

- a letter from Textron Inc. referring to the LOC by number, issuing institution and date, and also indicating the facility's EPA ID number, the facility name and address and the amount of funds assured by the LOC (see 41 CFR 264.145(d)(4));
- a standby trust fund (STF) as required by 41 CFR 264.145(d)(3) and as worded in 41 CFR 264.151(a)(1), including Schedules A and B and Exhibit A.

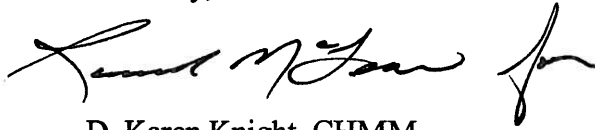
In addition, EPA has never received a formal notice of cancellation of the Corporate Guarantee (CG) from Textron. EPA is relying on informal information first received from MDEQ via email on or about March 19, 2009, in which an attached email from Textron to MDEQ indicated that the corporation might be replacing the CG with an LOC. Technically, the CG is still in force for 120 days from the date of notification, and the corporation has ninety (90) days from that date to fully implement the replacement FA instrument. Therefore, Textron should provide the missing documentation, including approval by the Agency, by June 19, 2009.

In the future, and in order to avoid the possibility of lost documentation and missed deadlines, Textron should address all FA documents, including amendments to the LOC and STF agreement, to:

EPA Region 4 Administrator
c/o Debbie Jourdan
Superfund & RCRA Records Program Manager
USEPA - Region 4
Atlanta Federal Center - 11th Floor
61 Forsyth Street, SW
Atlanta, GA 30303-8960

If you have any questions or concerns, please feel free to contact either Bob Stewart at (404) 562-8886 the Financial Assurance Expert or Don Webster at (404) 562-8469, the RCRA Program Manager for your facility.

Sincerely,



D. Karen Knight, CHMM
Chief, Corrective Action Section
RUST Branch
RCRA Division

cc: Robert G. Stewart, EPA
Debbie Jourdan, EPA
Jamie Schiff, Textron
Toby Cook, MDEQ

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>1. Article Addressed to:</p> <p style="text-align: center;">Mr. Don Williams Grenada Manufacturing, LLC 635 Highway 332 Grenada, MS 38901</p>		<p>A. Signature</p> <p><i>Don Williams</i></p> <p>B. Received by (Printed Name)</p> <p><i>Don Williams</i></p> <p>C. Date of Delivery</p> <p><i>5-22-09</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7004 1350 0003 033B 580B</p>		<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>PS Form 3811, February 2004</p> <p>Domestic Return Receipt</p>		<p>102595-02-M-1540</p>	

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<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Postage \$</td> <td style="width: 50%;"></td> </tr> <tr> <td>Certified Fee</td> <td></td> </tr> <tr> <td>Return Receipt Fee (Endorsement Required)</td> <td></td> </tr> <tr> <td>Restricted Delivery Fee (Endorsement Required)</td> <td></td> </tr> </table>	Postage \$		Certified Fee		Return Receipt Fee (Endorsement Required)		Restricted Delivery Fee (Endorsement Required)		<p>Postmark Here</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>
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<p>Mr. Don Williams Grenada Manufacturing, LLC 635 Highway 332 Grenada, MS 38901</p>									
PS Form 3800, June 2002 See Reverse for Instructions									

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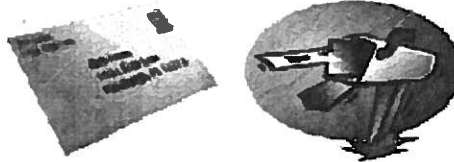


Enter New Record (Only SiteID and SiteName can be Blank)

New Certified Mail Record

Date: 05/18/2009

Certified No.:	70041350000303385808		
To:	DON WILLIAMS GRENADA MANUFACTURING, LLC		
Street:	635 HIGHWAY 332		
City:	GRENADA	State:	MS Zip Code: 38901
Sender:	WEBSTER DON	Ext:	2-8469
	(LastName, FirstName Middle Initial)		
Division:	RUS	Floor:	10
Building:	AFCTOWER	Unit:	
Alternate:		Alternate Ext:	
	(LastName, FirstName Middle Initial)		
Site Name:		Site ID:	



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Staff Meeting Notes (...)

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Sincerely,

D. Karen Knight, CHMM
Chief, Corrective Action Section
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cc: Robert G. Stewart, EPA
Debbie Jourdan, EPA
Jamie Schiff, Textron
Toby Cook, MDEQ

Donald Webster



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